VD WARD 627 4 200 DV6	ADDICE COLUMN A FUED Y
UNITED STATES DIS	
FOR THE MIDDLE DISTRICT	OF NORTH CAROLINA MAY - 4 2023
	IN THIS OFFICE
KAREN FINN, DR. JILLIAN FORD,	Clerk U.S. Astrot Court.
HYLAH DALY, JENNE DULCIO,	) By - 14 5 & )
GALEO LATINO COMMUNITY	)
DEVELOPMENT FUND, INC., NEW	
GEORGIA PROJECT ACTION	
FUND, LEAGUE OF WOMEN	
VOTERS OF MARIETTA-COBB, and	)
GEORGIA COALITION FOR THE	Ó
PEOPLE'S AGENDA, INC.,	No. 23 M.C. 13
	No. 25 11 (1)
Plaintiffs,	)
	)
V.	)
••	)
COBB COUNTY BOARD OF	<u></u>
ELECTIONS AND REGISTRATION	<u></u>
and JANINE EVELER, in her official	)
capacity as Director of the Cobb	)
* -	
County Board of Elections and	
Registration, and COBB COUNTY	
SCHOOL DISTRICT,	)
	)
Defendants.	

## NON-PARTY SOUTHERN COALITION FOR SOCIAL JUSTICE'S MOTION TO QUASH DEFENDANT'S SUBPOENA DUCES TECUM AND FOR SANCTIONS

COMES NOW non-party Southern Coalition for Social Justice (hereinafter "SCSJ"), counsel of record for Plaintiffs in the underlying action, and moves this Court to quash a subpoena *duces tecum* issued by Defendant Cobb County School District and served on SCSJ on April 20, 2023 (the "Subpoena"), and impose sanctions under Rule 45(d)(1), Fed. R. Civ. P. The Subpoena is attached hereto as Exhibit 1.

An earlier Subpoena issued by the Cobb County School District was the subject of an earlier Motion to Quash filed by SCSJ in this Court on March 13, 2023, No. 23 MC 8. That Motion to Quash (and its exhibits) is attached hereto as Exhibit 2.

A supporting memorandum fully setting forth the reasons for quashing the subpoena and imposing sanctions is filed contemporaneously with this Motion.

WHEREFORE, SCSJ respectfully requests that the motion to quash be granted and that sanctions representing SCSJ's reasonable attorneys' fees be imposed on Defendant Cobb County School District pursuant to Rule 45(d)(1), Fed. R. Civ. P.

This the 4th day of May, 2023.

WOMBLE BOND DICKINSON (US) LLP

Pressly M. Millen, NCSB No.: 16178

555 Fayetteville St., Suite 1100 Raleigh, North Carolina 27601

(919) 755-2135

(919) 755-2150

press.millen@wbd-us.com

Counsel for Non-Party Southern Coalition for Social Justice

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon the parties by depositing a copy thereof in the United States Mail, postage prepaid, and addressed as follows and by email:

Philip W. Savrin, Esq.
William H. Buechner, Jr., Esq.
P. Michael Freed, Esq.
FREEMAN MATHIS & GARY, LLP
100 Galleria Parkway, Suite 1600
Atlanta, GA 30339-5948
psavrin@finglaw.com
bbuechner@finglaw.com
michael.freed@finglaw.com

This the 4th day of May, 2023.

Pressly M. Millen

OF COUNSEL:

WOMBLE BOND DICKINSON (US) LLP 555 Fayetteville St., Suite 1100 Raleigh, North Carolina 27601 (919) 755-2100